

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Mail Processing Network
Rationalization Service Changes, 2012

Docket No. N2012-1

PUBLIC REPRESENTATIVE'S SECOND SET
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO
UNITED STATES POSTAL SERVICE WITNESS WHITEMAN (PR/USPS-T12: 8)

(April 3, 2012)

Pursuant to 39 CFR 3001.25 through 3001.28, the Public Representative hereby submits the following interrogatories and requests for production of documents. Definitions and instructions included with the Public Representative's First Set of Interrogatories and Requests for Production to United States Postal Service, PR/USPS-1-3 dated December 21, 2011, are hereby incorporated by reference.

The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,

/s/ Christopher J. Laver

Public Representative for
Docket No. N2012-1

901 New York Ave, N.W. STE 200
Washington, DC 20268-0001
(202) 789-6889; Fax (202) 789-6891
christopher.laver@prc.gov

PR/USPS-T12-8

Please refer to Chart 1 in your testimony that reports different values from the sum of the values reported in Figures 42-47 of the direct testimony of witness Elmore-Yalch (USPS-T-11). Please explain the discrepancy and provide the breakout tables by the six groups of survey subjects, analogous to those in witness Elmore-Yalch's testimony, that aggregate to Chart 1 of your testimony.